



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 16, 2015

Mr. Edward W. Collins
District Ranger, Lakeside Ranger District
Apache-Sitgreaves National Forests
2022 West White Mountain Boulevard
Lakeside, Arizona 85929

Subject: Camp Tatiyee Land Exchange Draft Environmental Impact Statement, Navajo County,
Arizona (CEQ # 20150159)

Dear Mr. Collins:

The U.S. Environmental Protection Agency has reviewed the Camp Tatiyee Land Exchange Draft Environmental Impact Statement (DEIS) pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA supports the proposed exchange, based on the rationale and analysis provided by the Forest Service in the Draft EIS. The Forest Service would receive a net gain of 1,375 acres in this exchange, and would be trading an isolated federally owned parcel with low resource value for private lands possessing high value habitat for sensitive, threatened, and endangered species. Additionally, the private lands that would be conveyed to and managed by the Forest Service contain valuable water resources, including 98 acres of wetlands and almost 528 acres of floodplain.

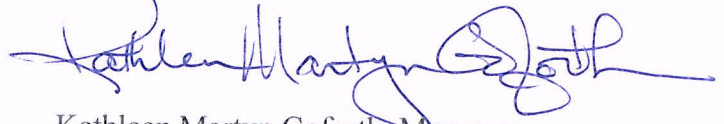
Based on our review of the DEIS, we have rated the proposed action and the document as Lack of Objections – Adequate (LO-1) (see the enclosed “Summary of EPA Rating Definitions”). Though supportive of this exchange, given the valuable lands that would be brought under Forest Service stewardship if it is completed, we recommend that the FEIS include additional information on the potential for the exchange to induce growth on the parcel that would be transferred into private ownership. The FEIS states that the conveyed federal lands would continue to be used for existing youth organization camps, with the remainder being available for future development within the Town of Pinetop-Lakeside, although no specific plans for future development have been made. Conveying land from federal to private hands, however, would, as stated in the DEIS, “increase the likelihood of development in the region,” thereby resulting in potential impacts to water resources and wildlife habitat. The potential for this land exchange to induce growth should be analyzed and discussed in the FEIS.

We also recommend that the Forest Service provide additional information on the tribal consultation that has been conducted for this proposed land exchange. The DEIS states that the Forest Service contacted nine Native American tribes and one chapter in the region concerning the proposed land exchange and the eight eligible historic properties located on the federal parcel. The DEIS does not describe the responses received from the tribes, if any, nor how this outreach may have informed the avoidance and mitigation measures proposed to address potential adverse effects to the historic properties. We recommend that the Forest Service provide an update, in the FEIS, on consultation between the Forest

Service and the tribal governments contacted to date. Discuss issues that were raised, how those issues were addressed in relation to the proposed land exchange, and how impacts to tribal or cultural resources would be avoided or mitigated, consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*, Section 106 of the National Historic Preservation Act, and Executive Order 13007, *Indian Sacred Sites*.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at 415-972-3521, or Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Kathleen Martyn Goforth". The signature is fluid and cursive, with the last name "Goforth" being particularly prominent.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

